

From: [Dana Thomas](#)
To: [Oliver, Jacques](#)
Subject: Fw: ORD Corporate Review of Florida Criteria Documents
Date: Thursday, March 25, 2010 5:05:12 PM

Fyi

----- Original Message -----

From: Bruce Rodan
Sent: 03/25/2010 01:46 PM EDT
To: Ephraim King; Dana Thomas
Cc: Robert Cantilli
Subject: Fw: ORD Corporate Review of Florida Criteria Documents

Ephraim and Dana,

Thanks for a very helpful discussion on Tuesday. I trust the following email sent to the ORD labs to coordinate their assistance is consistent with what you need. If not, Dana, please give Bob or me a call.

Bruce D. Rodan

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----- Forwarded by Bruce Rodan/DC/USEPA/US on 03/25/2010 01:41 PM -----

From:

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Date: 03/25/2010 12:19 PM

Subject: ORD Corporate Review of Florida Criteria Documents

Steve, Bill,

Thanks to you and all the ORD staff for a most productive meeting with OW on Tuesday. I think Dana Thomas summed it up saying that OW & GED were proud of the work that they had done on the Florida criteria, but that it was coming in for criticism due to the importance and precedent setting nature of the actions. As an Administrator priority, Bob Perciasepe and Bob Sussman have asked that ORD review the Florida documents and come up with an ORD corporate position on the scientific basis for these proposed standards. As Ephraim explained, they are looking for an assessment of whether a reasonable scientific approach was chosen by OW and ORD-GED given the data and tools available when they were developed. If ORD believes there is a better alternative, they are asking for us to elaborate on this.

There are a series of documents and Florida criteria deadlines (inland waters, downstream criteria, empirical methods, estuarine criteria) over the next year for which ORD is being asked for support. OW is asking us to prioritize our activities to match the sequence of these deadlines. **The first of these requests is for ORD to review the technical basis for the Florida Inland Waters Criteria as detailed in the 5 attached documents, along with the critique (4 documents) provided by the State of Florida.** This first phase is limited to the lakes/streams/canals/springs portion of the proposed rule, holding off on the downstream values and Sparrow model until the second phase, as issuance of these downstream criteria has been delayed.

Task 1: Review of Florida Inland Waters Criteria

Identification of Reviewers: Please submit names of reviewers to Bob Cantilli ASAP (no later than Wed, 3/31).

Comment Submission Date: By **April 26** to Robert Cantilli and Bruce Rodan (in order to make OW's deadline from corporate ORD of May 3).

Note: The focus of comments in Task 1 is on the use of the Reference Condition Approach and related Stressor-Response Analysis for the lakes, streams, canals and springs inland water criteria. We recognize that the application of the Sparrow model to develop downstream protective criteria is woven into these documents. Although reading these portions on downstream modeling may be unavoidable or even warranted, we are asking that formal ORD comments on downstream/Sparrow be deferred until a subsequent phase in order to prioritize resources and synchronize with the delayed downstream water regulatory schedule.

EPA-OW Florida Documents

[attachment "NCD Technical Document for FL Inland Waters.doc" deleted by Bruce Rodan/DC/USEPA/US] [attachment "OW 1-16 Deliverable_Final.pdf" deleted by Bruce Rodan/DC/USEPA/US] [attachment "EPA Response to Peer Review Findings on Proposed Methods TSD.pdf" deleted by Bruce Rodan/DC/USEPA/US] [attachment "TSD for EPA's Proposed Rule for Inland Surface Fresh Waters.pdf" deleted by Bruce Rodan/DC/USEPA/US] [attachment "2010 Proposed Rule.pdf" deleted by Bruce Rodan/DC/USEPA/US]

State of Florida Comments:

[attachment "FDEP_concerns_epa_nutrients_0210.pdf" deleted by Bruce Rodan/DC/USEPA/US] [attachment "FDEP_comments_lakes_criteria.pdf" deleted by Bruce Rodan/DC/USEPA/US] [attachment "FDEP_comments_lakes_dpv.pdf" deleted by Bruce Rodan/DC/USEPA/US] [attachment "FDEP_comments_streams_criteria.pdf" deleted by Bruce Rodan/DC/USEPA/US]

If reviewers require further context and background on these documents and the overall Florida effort, please have them call Bob Cantilli on 202 566 1091.

Our understanding is that the only ORD folks who have been engaged to date have been Rick Greene, Jim Hagy of GED, Lester Yuan then of NCEA (now of OST).

Thank you very much.

Bruce D. Rodan

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